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Proceeding Filing Comments for 04-186

I represent the licensees and owners of TV translators in the Salt Lake City DMA and we understand the FCC is considering the adoption of rules to permit the operation of unlicensed devices on vacant TV channels. We agree that anything that makes better broadband data services more available in rural areas is good, but not at the expense of our free-over-the-air television. In this capacity, we urge you to consider this potential interference problem, to not only our existing analog service, but also in our transition to the new digital reception for our rural communities.

There are over 600 analog TV translator stations now in operation in this state with an additional 400 FCC authorized construction permits now issued for companion digital channels for us to operate on. It is extremely important that the unlicensed operations not disrupt our over-the-air analog or digital television service.

The FCC is urged to write the unlicensed rules in a very cautious conservative, careful manner as it will be easier to relax the rules later if they are overly restrictive than to correct them later. We hope you will fully protect our present day and future subscription free service.

We know most of the rural translator viewers watch television far beyond the FCC protected contours and it is not certain exactly how these white areas will be defined, if in fact they really can be. We are not aware of any actual field tests concerning this issue, being or have been performed.

Not only will interference be experienced in our state, other states will also be greatly impacted. This potential problem will be experienced to TV translator stations nation wide. Over 6,000 TV translator stations now serve Rural America and they stand to be most vulnerable. Many are located in the Western States*.

Those of us living in the rural areas of this country inevitably know there will be cases of interference to our existing television services if the FCC does not adopt adequate protection rules.

Points of concern:

- Cause interference to home television receivers in proximity of unlicensed devices.
- Failure to define how to protect TV broadcasters and other licensed services from harmful interference caused by the use of such unlicensed devices.
- Failure to consider the problem of the impact of mobile transmit signals to our existing mountain top TV receive channels (Snowmobiles, ATV's, etc.)
- No method of policing these unlicensed operations.

** The following western states translator numbers are approximate and were derived from a recent TV Fact Book. In addition, LPTV stations operating as translators are not included in these numbers:*

Alaska.....	517
New Mexico...	291
California.....	454
Oregon.....	406
Colorado.....	620
Idaho.....	244
Utah.....	669
Washington....	253
Montana.....	357
Wyoming.....	182
Nevada.....	315

Also note: Analog signal interference merely produces unwanted co-channel lines that degrade the picture. However, even minor interference into digital signals creates a pixel or blanking effect and becomes intolerable. Increased interference completely removes all picture and sound.

Further concerns:

- Not a single field test has actually been conducted to prove the verbal claims of this new concept.
- The industry is unaware of any new innovative equipment that has been manufactured to provide absolute protection.
- Free over-the-air television reception must be protected for rural viewers who depend on local broadcast signals for emergency information and warnings, i.e., EAS, Amber Alert and Terrorist Alerts.
- Rural viewers should have their existing services protected because many rural people simply cannot afford any type of subscription television.
- Once the proposed rules are approved, history has shown that any violations to them involving interference or power levels will be unenforceable. The violations involving CB radios throughout the 1970's to the present are a pertinent example of added power amplifiers to extend their service.

CONCLUSION AND PROPOSED ACTION

Protected area vs. protected contour:

This second NPRM does not address the question of exactly where TV reception will be protected but the earlier NPRM proposed relying on the official protected contour. Protected contours for translators are based on are relatively high field strength; many of the public served by translators is located outside this official protected contour. Translator served homes commonly use outdoor antennas and can achieve satisfactory UHF reception with field strengths down to 54dBu, 20 dB lower than the protected contour. UHF digital signals can successfully be used down to a -85 dBm. This should be taken into account.

Respectfully,

A handwritten signature in black ink, appearing to read "R. Kent Parsons", with a stylized flourish at the end.

R. Kent Parsons

State of Utah TV Translator Coordinator